

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION**

THE GEILER COMPANY,

Plaintiff,

No. 4:22-mc-00001-TWP-DML

V.

**INTERNATIONAL ASSOCIATION OF :
SHEET METAL, AIR, RAIL, AND :
TRANSPORTATION WORKS, :
LOCAL UNION NO. 24. :**

**INTERNATIONAL ASSOCIATION OF
SHEET METAL, AIR, RAIL, AND
TRANSPORTATION WORKS,
LOCAL UNION NO. 24.**

**SHEET METAL, AIR, RAIL, AND
TRANSPORTATION WORKS,
LOCAL UNION NO. 24.**

LOCAL UNION NO. 24.

Defendant.

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DECLARATION OF WILLIAM REID GEILER III

I, Reid Geiler, being first duly sworn upon my oath, state:

1. My name is William Reid Geiler III. I am an adult of sound mind and body, competent to testify as to the matters contained herein.

2. I am currently, and at all times relevant to this dispute was, the Vice President of The Geiler Company.

3. On September 8, 2021, I attended the arbitration concerning the complaint filed by the International Association of Sheet Metal, Air, Rail, and Transportation Workers, Local Union No. 24 concerning The Geiler Company's alleged violation of Article II, Section 1 of the Collective Bargaining Agreement (the "Agreement") relevant to this cause of action and concerning the Sunman Dearborn Schools Project in front of the Local Joint Adjustment Board (the "Board").

4. During this hearing, I presented argument to the Board that the project was governed under Indiana's Right-to-Work statute; thus, The Geiler Company was not in violation of Article II, Section 1 of the Agreement.

EXHIBIT G

5. During this hearing, I also presented argument to the Board that the Union's grievance was untimely pursuant to a plain reading of the Agreement.

I DECLARE UNDER PENALTIES OF PERJURY THE FOREGOING IS TRUE AND CORRECT.

Dated: 6/5/2022

William Reid Geiler III
William Reid Geiler III